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August 4, 2022

Via ECF

Hon. Mark W. Pedersen
 United States Magistrate Judge
 Kenneth B. Keating Federal Building
 100 State Street
 Rochester, NY 14614
 TEL: (585) 613-4360
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pedersen@nywd.uscourts.gov

Re: John Doe v. Hobart and William Smith Colleges, et al., No. 20-cv-6338

Dear Judge Pedersen:

This firm represents defendant Hobart and William Smith Colleges in the above-referenced matter, and I write on behalf of all the parties to request extensions of the discovery deadlines in the Court's Amended Scheduling Order [ECF 55].

The parties are moving forward with discovery and have exchanged written discovery and produced the bulk of the documents responsive to pending requests. The document production process took a fair amount of time since there are other students involved and the parties first had to resolve the issue of objections under FERPA. As explained during the hearing on this issue last March, the time it took to resolve these issues has made completing discovery within the current deadlines difficult. The Parties require additional time to take depositions, some of which involve out of state third parties. In order to accommodate these issues and the parties' continued discovery efforts, the parties respectfully request extensions of certain deadlines as outlined below. This is the parties' first request for an extension of the discovery deadlines.

	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
All factual discovery	September 30, 2022	January 27, 2023
Motions to compel discovery	August 30, 2022	December 30, 2022
All expert discovery	December 30, 2022	April 28, 2023
Plaintiff expert reports	October 31, 2022	March 3, 2023

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Defendant expert reports	November 30, 2022	March 31, 2023
Dispositive motions, if any	January 31, 2023	May 31, 2023

If the Court would like additional information, the parties would be happy to provide it.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael E. Baughman".

Michael E. Baughman

Cc: Stuart Bernstein, Esq.
Brian Biggie, Esq.